

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

THANH THACH,

Plaintiff,

CIVIL NO. 3:14-cv-070

v.

**EQUIFAX INFORMATION SERVICES, LLC.,
EXPERIAN INFORMATION SOLUTIONS, INC.,
BRYANT STATE BANK, CREDIT ONE BANK,
COMENITY BANK, FIRST PREMIER BANK,
LVNV FUNDING, LLC.,**

Defendants.

**DEFENDANT EQUIFAX INFORMATION SERVICES, LLC'S
RESPONSES TO PLAINTIFF'S
FIRST SET OF REQUEST FOR PRODUCTION**

Defendant, Equifax Information Services LLC ("Equifax"), hereby responds to Plaintiff Thanh Thach's Request for Production of Documents ("Requests") as follows:

OBJECTIONS

Equifax hereby incorporates its previously served objections to Plaintiff's First Set of Request for Production of Documents, as if fully set forth herein.

RESPONSES TO REQUESTS

REQUEST FOR PRODUCTION NO. 1:

Please produce all documents identified in or regarding any of your answers to the Interrogatories propounded by the Plaintiff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

See EIS-THACH-000001 through EIS-THACH-000185.

REQUEST FOR PRODUCTION NO. 2:

Please produce all documents in your possession with regard to the Plaintiff or the subject of this suit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

See EIS-THACH-000001 through EIS-THACH-000185.

REQUEST FOR PRODUCTION NO. 3:

Please produce all correspondence between you and the Plaintiff that regards the subject of this lawsuit or the Plaintiff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

See EIS-THACH-000031 through EIS-THACH-000045, EIS-THACH-000061 through EIS-THACH-000072, and EIS-THACH-000110 through EIS-THACH-000121.

REQUEST FOR PRODUCTION NO. 4:

Please produce all documents or that which you intend to produce at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Equifax has not identified the documents it intends to produce at trial.

REQUEST FOR PRODUCTION NO. 5:

Please produce the personnel file(s) of each employee who has ever reviewed the Plaintiff's credit report or consumer report.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

See Equifax's previously served objections.

REQUEST FOR PRODUCTION NO. 6:

Please produce copies of any internal investigations conducted by *Equifax* regarding the allegations contained in the Plaintiff's Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Subject to its previously served objections, see EIS-THACH-000001 through EIS-THACH-000030, EIS-THACH-000046 through EIS-THACH-000060, EIS-THACH-000073 through EIS-THACH-0000109, and EIS-THACH-000122 through EIS-THACH-00052.

REQUEST FOR PRODUCTION NO. 7:

Please produce any listing, concordance, or definition of any codes, response codes, shorthand, or abbreviations appearing in any of the documents produced by *Equifax*.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

See Equifax's previously served objections.

REQUEST FOR PRODUCTION NO. 8:

Please produce any list generated by you—and specifically by any writing department within your organization—of manuals or guides produced or published by or within your organization.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

See Equifax's previously served objections.

REQUEST FOR PRODUCTION NO. 9:

Please produce terminal audit trails as of the date of access of the Plaintiff's consumer reports by any of your subscribers who have received the Plaintiff's consumer report since January 1, 2012.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

See EIS-THACH-000153 through EIS-THACH-000155.

REQUEST FOR PRODUCTION NO. 10:

Please produce each and every archived report you maintain regarding Plaintiff or any of her personal identifiers from January 1, 2012. This request includes all LogFs, ACIS File Dumps, Consumer Disclosures or Reinvestigation Results and all monthly frozen scans available regarding any data file which you or any of your affiliates have caused to be merged into Plaintiff's consumer reports or disclosures.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Subject to its previously served objections, see EIS-THACH-000001 through EIS-THACH-000185.

REQUEST FOR PRODUCTION NO. 11:

All documents, manuals, guides, or other materials relating to mixed files.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Subject to its previously served objections, and subject to the entry of a protective order, Equifax will produce its relevant mixed-file manual.

REQUEST FOR PRODUCTION NO. 12:

All documents related to deletion and soft delete procedures.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Subject to its previously served objections, and subject to the entry of a protective order, Equifax will produce its relevant indicating manual.

REQUEST FOR PRODUCTION NO. 13:

All documents related to the procedures for assigning information reported to Equifax to a consumer's file, including the matching procedures and algorithms.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Subject to its previously served objections, and subject to the entry of a protective order, Equifax will produce relevant manuals that may be responsive to this Request.

REQUEST FOR PRODUCTION NO. 14:

All documents related to the procedures for assigning information reported to Equifax to a consumer's file, including the address matching procedures and algorithms.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Subject to its previously served objections, and subject to the entry of a protective order, Equifax will produce relevant manuals that may be responsive to this Request.

REQUEST FOR PRODUCTION NO. 15:

All documents related to procedures followed and action taken to prevent inaccurate information from being reported about Plaintiff or appearing in Plaintiff's file.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Subject to its previously served objections, and subject to the entry of a protective order, Equifax will produce relevant manuals that may be responsive to this Request.

REQUEST FOR PRODUCTION NO. 16:

Please produce copies of any statements you have taken or received from any third person in any way connected with the allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

None.

REQUEST FOR PRODUCTION NO. 17:

Please produce a copy of each and every screen and file in your consumer credit database that in any way references Plaintiff and/or her personal identifiers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Subject to its previously served objections, see EIS-THACH-000001 through EIS-THACH-000185.

REQUEST FOR PRODUCTION NO. 18:

Please produce any document that details and describes the organizational structure of *Equifax* and any of its related sister or subsidiary entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

See Equifax's previously served objections.

REQUEST FOR PRODUCTION NO. 19:

Please produce your annual report issued for either the fiscal or calendar years 2011, 2012, and 2013. (In lieu of producing such documents, you may produce a written stipulation of the amount of your Net Worth as of January 1, 2014).

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Equifax does not issue an annual reports.

REQUEST FOR PRODUCTION NO. 20:

Please produce for each fact witness or expert witness you believe may have knowledge of any of the facts, or matters that are alleged in Plaintiff's Complaint, your answer, anticipated answer and/or defenses thereto and/or may have formed any opinion or consulted with you about the facts or basis of this lawsuit or any defense or allegation you have raised in this lawsuit, produce a copy of any affidavit, deposition, transcript, or report which contains the testimony or opinion(s) of such witness and which has been previously furnished to the court or opposing counsel in such case.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

See Equifax's previously served objections.

REQUEST FOR PRODUCTION NO. 21:

Please produce all documents and or manuals used in connection with the training or instruction of any of your employees in the finance or credit department regarding obtaining consumers' credit reports and your compliance with the FCRA, 15 U.S.C. §1681e.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Subject to its previously served objections, and subject to the entry of a protective order, Equifax will produce its relevant indicating and policies and procedures manuals.

REQUEST FOR PRODUCTION NO. 22:

Please produce copies of any and all documents which contain any data about reliability assessments, audits, reports, or studies of consumer credit data provided to you by your subscribers or any grouping of subscribers in the years: 2011, 2012, and 2013. Include, by example only and without limitation, all communications and other exchanged documents regarding the PERC "study" on credit reporting and reviews and financial analysis of the costs and benefits of using a NCAC agent in Chile.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

See Equifax's previously served objections.

REQUEST FOR PRODUCTION NO. 23:

Produce all consumer complaints (lawsuits or otherwise) you have received in the last four years made or brought against you by consumers based on the alleged inaccuracy of insertion of mixed file information into a consumers file.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

See Equifax's previously served objections.

Respectfully submitted this 25th day of July, 2014.

/s/ John W. Montgomery, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2014, a true and correct copy of the foregoing was sent via electronic mail to the following counsel of record:

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